

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DALE A. GUILFOIL,

Plaintiff

v.

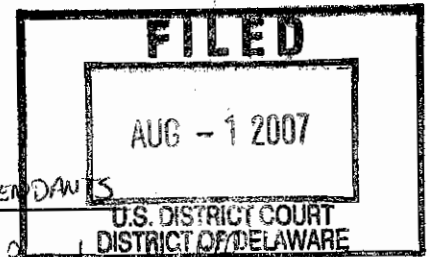
DAVID PIERCE, et al.,

Defendants

C.A. NO. 06-493-GMS

JURY TRIAL REQUESTED

PLAINTIFFS' REQUEST FOR PRODUCTION
OF DOCUMENTS AND THINGS DIRECTED TO DEFENDANTS



Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff hereby serve on Defendants, David Pierce et al., the following Request for Production of Documents and Things. BD scanned

INSTRUCTIONS

A. If any document or thing required to answer any Request for Production is withheld because you claim that such information is privileged or is contained in a privileged document or communication:

(1) identify each such document with sufficient specificity to permit a court to determine the propriety of the asserted privilege and setting forth the nature of the documents;

(2) identify the privilege and set forth the factual basis for the privilege claim;

(3) set forth each Request to which each such document or thing is responsive;

B. These Request For Production are continuing in nature and, if applicable, will require supplemental response pursuant to Rule 26(e) of the Federal Rule of Civil Procedure.

REQUESTS FOR PRODUCTIONS

REQUEST NO. 1:

1. Any and all responses from the Department of Correction Personnel to plaintiff regarding, relating, or arising out of the incidents alleged in plaintiff's complaint including, but not limited to all correspondence to grievances, letters, or complaints which were filed by plaintiff.

REQUEST NO. 2:

2. All correspondence relating to, regarding or arising out of the incidents alleged in plaintiff's complaint including, but not limited to any correspondence between Department of Correctional Personnel and inmates or other witnesses.

REQUEST NO. 3:

3. Any statements, declarations, petitions or affidavits relating to, regarding or arising out of the incidents alleged in plaintiff's complaint and any statements, declarations, or affidavits of Department of Correctional Personnel, other inmates, or witnesses to the allegations in the plaintiff's complaint.

REQUEST NO. 4:

4. Any and all correspondence between Department of Correctional Personnel and any sub-contractor regarding, relating to or arising out of the allegation in plaintiff's complaint.

REQUEST NO. 5:

5. Copies of all rules, regulations, or policies regarding which inmates are permitted to be assigned "medical bottom bunk" in Delaware Correctional Center and who approves such moves, or assignments.

REQUEST NO. 6:

6. Medical training certificate and/or credentials of any and all the defendants named in plaintiff's complaint.

REQUEST NO. 7:

7. Any and all medical reports addressed to any defendant from any medical professional regarding the plaintiff's medical condition or their opinion concerning the allegation in plaintiff's complaint.

REQUEST NO 8:

8. Any and all documents, referenced or identified in defendants Responses to Interrogatories served contemporaneously herewith.

Dale Guilfoil

Dale Guilfoil pro se.

166308

Sussex Correctional Institution

Post Office Box 500

Georgetown, DE 19947

Dated July 30, 2007

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2007 I have mailed by United States Postal Service a copy of the foregoing motion to, Eileen Kelly, Deputy Attorney General, Attorney for the defendants, to 820 N. French St. 6th Floor, Wilmington, Delaware 19801.

Dale Guilfoil
Dale Guilfoil 166308
Sussex Correctional Institution
Post office Box 500
Georgetown, De 19947

Dated July 30, 2007

1/M. Del. G. 127 BLDG. M. 5-28
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500 166308
GEORGETOWN, DELAWARE 19947

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Office of the Clerk
United States District Court
844 N. King Street, Lock Box 18
Wilmington Delaware
19801-3570

LEGAL MAIL

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EX-101